RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP Joseph L. Schwartz, Esq. (JL-5525) J. Alex Kress, Esq. (JK-7189) Headquarters Plaza One Speedwell Avenue Morristown, New Jersey 07962 (973) 538-0800

Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

Chapter 11

CECERE ASSOCIATES, L.L.C., and CECERE REALTY ASSOC., LLC,

Case Nos. 09-30759 and 09-30760

Hon. Donald H. Steckroth, U.S.B.J.

(JOINT ADMINISTRATION MOTION PENDING)

Debtors.

Hearing Date: September 15, 2009 at 10:00 a.m.

NOTICE OF MOTION PURSUANT TO SECTIONS 105(a) AND 363 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 6004 FOR AN ORDER (I) ESTABLISHING AND APPROVING BIDDING PROCEDURES WITH RESPECT TO THE SALE OF REAL PROPERTY OF THE DEBTORS AND (II) APPROVING A SALE FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS

TO: ALL CREDITORS ON THE ATTACHED SERVICE LIST

CECERE ASSOCIATES, L.L.C. and CECERE REALTY ASSOCIATES, LLC (the "Debtors") have filed papers with the Court for (i) entry of an Order pursuant to sections 105(a) and 363 of Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002 and 6004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") establishing and approving bidding procedures with respect to the sale of the Debtors' real property free and clear of liens, claims, encumbrances and interests ("Part I of the Motion"), and (ii) entry of an order at the Sale Hearing approving the sale of the Debtors' real property and certain other assets free and clear of all liens, claims, encumbrances and interests pursuant to Bankruptcy Code § 363 ("Part II of the Motion", and collectively with Part I of the Motion, the "Motion"). (A copy of the Motion is enclosed with this Notice.)

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant Part I of the Motion and issue the Order Establishing and Approving Bidding Procedures With Respect to Substantially All of the Debtors' Assets submitted with the Motion or if you want the Court to consider your views on Part I of the Motion then, on or before September 8, 2009, you or your attorney must:

• File an objection, pursuant to D.N.J. LBR 9013-1(d) stating with specificity the basis for such objection, with the Clerk of the Bankruptcy Court at:

United States Bankruptcy Court District of New Jersey Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, New Jersey 07102

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

- Deliver a copy of your response (a) to counsel to Cecere Associates, LLC and Cecere Realty Associates, LLC, at the following address: Riker, Danzig, Scherer, Hyland & Perretti LLP, Attn: J. Alex Kress, Esq., One Speedwell Avenue, Morristown, New Jersey 07962-1981 phone: (973) 538-0800, fax: (973) 538-1984, e-mail: akress@riker.com and (b) to all parties on the attached service list, so as to be received on or before September 8, 2009.
- Attend the hearing scheduled to be held on <u>September 15, 2009</u>, at <u>10:00 a.m.</u> before The Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Courtroom 3B, Newark, New Jersey 07102.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in Part I of the Motion and may enter the Orders granting the relief sought in Part I of the Motion. Pursuant to D.N.J. LBR 9013-1(a), unless objections are timely presented, Part I of the Motion shall be deemed uncontested in accordance with Local Rule 9013-1(a), and the relief requested may be granted without a hearing.

RIKER DANZIG SCHERER HYLAND & PERRETTI LLP Counsel for the Debtors

By: /s/ J. Alex Kress
J. Alex Kress

Dated: August 21, 2009

In re: Cecere Associates, L.L.C. and Cecere Realty Assoc., LLC Case Nos. 09-30759 (DHS) and 09-30760 (DHS) <u>Service List</u>

AC&R, Inc. 195 Richards Ave. Dover, NJ 07801	Advanta PO Box 30715 Salt Lake City, UT 84130-0715
American Express PO Box 1270 Newark, NJ 07101-1270	American Express PO Box 6618 Omaha, NE 68105-0618
American Express c/o NCO Financial Systems 507 Prudential Rd. Horsham, PA 19044	AT&T PO Box 78522 Phoenix, AZ 85062-8522
Chase PO Box 15153 Wilmington, DE 19886-5153	Citi Cards PO Box 6077 Sioux Falls, SD 57117-6077
Coca-Cola 68 Annex PO Box 102190 Atlanta, GA 30368-0190	County of Morris PO Box 900 Morristown, NJ 07963-0900
D&A Associates 271 Rt. 46 West Fairfield, NJ 07004	High Technology Fire & Security Systems 3 Millpond Ct. Randolph, NJ 07869
IRS Centralized Insolvency Operation PO Box 21126 Philadelphia, PA 19114	NJ Division of Taxation Revenue Processing Center PO Box 194 Trenton, NJ 08647-0194

James and Debbie Hodgins 104 Prospect Street Boonton, NJ 07005	Robert E. Nies, Esq. Wolff & Samson PC One Boland Drive West Orange, Nj 07052-3686
New Jersey Natural Gas PO Box 1378 Wall, NJ 07715-0001	Petro Mechanics, Inc. 18 Prices Ln. Lafayette, NJ 07848
PFI t/a Northwest Petroleum 706 Route 15 South Suite 201B Lake Hopatcong, NJ 07849	Pitney Bowes PO Box 908 Shelton, CT 06484
Pitney Bowes PO Box 856460 Louisville, KY 40285-6460	Porzio, Bromberg & Newman, PC 100 Southgate Parkway Morristown, NJ 07962-1997
Town of Boonton 100 Washington Street Boonton, NJ 07005	State of New Jersey NJ Division of Taxation Revenue Processing Center PO Box 194 Trenton, NJ 08647-0194
US Bank PO Box 108 Saint Louis, MO 63166-9801	Verizon c/o Harvard Collection Services, Inc. 4839 N. Elston Ave. Chicago, IL 60630-2534
Waste Management PO Box 13648 Philadelphia, PA 19101-3648	Wells Fargo 420 Montgomery Street San Francisco, CA 94163

Wachovia Mail Code VA7391 PO Box 13327 Roanoke, VA 247040	Ralph J. Marra, Jr, Esq. Newark U.S. Attorney's Office 970 Broad Street, 7th Floor Newark, NJ 07102
Anne Milgram, Esq. Office of The Attorney General Richard J. Hughes Justice Complex 8th Floor, West Wing 25 Market Street Trenton, NJ 08625-0080	JCP&L PO Box 3687 Akron, OH 44309-3687
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